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CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ESTHER HWANG,

Plaintiff,

vs.

CITY AND COUNTY OF SAN  
FRANCISCO, ET AL.

Defendants.

Case No. C07-02718 MMC

**ADMINISTRATIVE REQUEST TO  
FILE UNDER SEAL DECLARATION  
OF LT. DANIEL J. MAHONEY IN  
SUPPORT OF DEFENDANTS' REPLY  
TO OPPOSITION TO MOTION FOR  
SUMMARY JUDGMENT AND/OR  
PARTIAL SUMMARY JUDGMENT**

**DECLARATION OF SEAN F.  
CONNOLLY IN SUPPORT THEREOF**

**[CIVIL L.R. 7-11]**

Hearing Date: September 12, 2008  
Time: 9:00 a.m.  
Place: Judge Maxine M. Chesney,  
Courtroom 7, 19th Floor,  
San Francisco, CA

Trial Date: October 27, 2008

Pursuant to Civil Local Rules 79-5(b) and 7-11, defendants bring this Administrative Request  
to File Under Seal the following documents:

ADMIN. REQUEST TO FILE UNDER SEAL LT.  
MAHONEY DECL.; CASE NO. C07-02718 MMC

1 Defendants City and County of San Francisco, et al., respectfully request that portions of the  
2 Declaration of Lt. Daniel J. Mahoney in Support of their Reply to Plaintiffs' Opposition to  
3 Defendants' Motion for Summary Judgment and/or Partial Summary Judgment be filed under seal as  
4 it contains information that is either private, subject to State confidentially laws regarding personnel  
5 records or otherwise considered confidential under State or federal law.

6 Specifically, defendants request an order permitting the following to be filed under seal:

7 1. Portions of the Declaration of Lt. Daniel J. Mahoney in Support of their Reply to  
8 Plaintiffs' Opposition to Defendants' Motion for Summary Judgment and/or Partial Summary  
9 Judgment. A redacted, public version of the brief has already been efiled.

10 2. Exhibit A to the declaration of Lt. Daniel J. Mahoney.

11 Defendants respectfully request that the Court grant their Administrative Request to File  
12 Under Seal.

13 Dated: August 29, 2008

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15 DENNIS J. HERRERA  
16 City Attorney  
17 JOANNE HOEPER  
18 Chief Trial Deputy

19 By: s/Sean F. Connolly  
20 SEAN F. CONNOLLY  
21 Deputy City Attorney

22 Attorneys for Defendant  
23 CITY AND COUNTY OF SAN FRANCISCO  
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**DECLARATION OF SEAN F. CONNOLLY**

I, Sean F. Connolly, declare as follows:

1. I am a Deputy City Attorney in the San Francisco City Attorney's Office, which is counsel of record for the Defendants in the above-captioned matter.

2. I have personal knowledge of the contents of this declaration and could and would testify competently thereto if called upon to do so.

3. I have reviewed the Declaration of Lt. Daniel J. Mahoney in Support of Defendants' Reply to Plaintiffs' Opposition to Defendants' Motion for Summary Judgment and/or Partial Summary Judgment, discussed *supra*, and determined that it is necessary to have sealed the certain portions of the Declaration of Lt. Daniel J. Mahoney as well as Exhibit A, as it contains information that is either private, subject to State confidentiality laws regarding personnel records or otherwise considered confidential under State or federal law.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August 29, 2008 at San Francisco, California.

s/Sean F. Connolly  
SEAN F. CONNOLLY